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Geos CCM

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February 22, 2010

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB Docket No. 06-36  
Geos Communications, Inc.  
(formerly i2Telecom International, Inc.)  
430 N Carroll Avenue, Suite 120  
Southlake, Texas 76092  
Certificate of CPNI Filing, February 21, 2009**

Geos Communications, Inc (Geos) hereby files its certificate of compliance pursuant to 47 C.F.R. § 64.2009(e) and respectfully states as follows:

1. Geos met, with the exceptions explained below, the requirements of 47 C.F.R. § 64.2009(e) (the "CPNI Requirements") during the period from January 1, 2009 to December 31, 2009.
2. Geos has established operating procedures that are adequate to ensure compliance with the rules under 47 C.F.R. § 64.2009.
3. During 2009 Geos (a) made no use of CPNI during 2009 for any sales or marketing campaigns; (b) did not provide CPNI information to any third party to be used in any sales or marketing campaigns; (c) did not suffer any known or reported breaches of CPNI; (d) has not instituted any actions against data brokers; and (e) did receive any customer complaints related to CPNI.
4. In compliance with 47 C.F.R. § 64.2009(a) Geos has a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI; however, Geos has not used customer CPNI for any marketing reasons.
5. Geos meets the requirements of 47 C.F.R. § 64.2009(b) in that all Geos personnel that deal with CPNI have been trained as to when they are and are not authorized

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to use CPNI and Geos has an express disciplinary process in place concerning CPNI.

6. Geos maintains records in compliance with 47 C.F.R. § 64.2009(c) regarding sales and marketing campaigns; however, to date Geos has had no sales and marketing campaigns that make use of CPNI nor has Geos disclosed or provided CPNI to third parties except for court order or subpoena.
7. In compliance with the requirements of 47 C.F.R. § 64.2009(d) Geos has a supervisory review process for CPNI use during outbound marketing situations; however, to date Geos has had no outbound marketing campaigns that make use of CPNI.
8. In 2009 Geos had only a small number of subscribers. It had approximately 5,000 subscribers to its "Voicestick™" service, which is a softphone that can either be downloaded directly or obtained on a memory stick. It had approximately 4,784 subscribers to an experimental service called "MyGlobalTalk™," which is a service for which the user downloads software into his or her mobile handset, and then can use that handset and the caller's mobile phone service to place discounted domestic and international long distance calls.
9. On September 9, 2008, Geos implemented a new switch and billing system. The MyGlobalTalk™ customers began operating on the new switch and billing system while the Voicestick™ customers remained operating on the old switch and billing system. The new switch and billing system has the appropriate CPNI safeguards and is in compliance with 47 C.F.R. § 64.2009(e), including the ability to monitor and track when changes were made to addresses of record and to send customers immediate notifications of changes to their account information.
10. The Voicestick™ customers transitioned to the new switch and billing system in April of 2009. To give the Voicestick™ customer appropriate CPNI protection prior to the transition, we implemented a procedure whereby no CPNI data would be given to any Voicestick™ customer that did not present a password or who could not be authenticated by a call to the customer's Geos-provided number. In addition, for Voicestick™ customers no passwords were allowed to be retrieved, and no passwords or emails addresses were allowed to be changed, unless the customer could be authenticated by a call to the customer's Geos-provided telephone number of record. This included changes to passwords or email addresses that would otherwise have been made online.



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11. Geos has taken steps to secure customer information. For example, Geos issued passwords to all customers at account set-up, when Geos also collects a primary address (Registered Location for its interconnected VoIP product), billing address, shipping address, email address and credit card information. The initial passwords were randomly generated and sent to the email address that the customer provided when establishing his or her account, and making his or her initial purchase. The customer could thereafter log in via the Internet and change his or her password. When the customer selected a new password, the customer was not prompted to not use biographical or readily available account information.
12. Geos also took the following additional steps to further secure its CPNI and protect its customers against unauthorized disclosures. Geos customers were required to provide their password prior to any release of CPNI, including call detail information, whether online or in response to a customer-initiated telephone call. Only when the customer is authenticated by presenting the password, will Geos allow a customer to (1) change account information (such as email address); and/or (2) obtain call detail information. Geos will allow a customer to obtain a lost or forgotten password (1) when Geos can authenticate the customer by calling him or her back at a telephone number of record that had been provided by Geos; or (2) when the customer calls in and requests the password be sent to the customer's email address of record.
13. In addition, for Geos customers on the new switch and billing system to retrieve a forgotten password online, the user is prompted to enter the username and email address of record for that account. If username and email address match, and the email address of record is more than 30 days old, a link is emailed to a unique webpage that allows the user to change his or her password, but only after he or she answers two security questions that are not based on account specific information nor readily known biographical information. Geos also provides these customers with an email notice when account information, including password or email address, has been changed. In the case of a change of email addresses, the notice is sent to both the prior email address and the new email address.
14. In short, for all Geos customers on the new switch and billing system Geos achieved compliance with the Commission's CPNI rules. As of April 2009 when all VoiceStick customers were transferred to the new switch and billing system complete compliance was achieved. Prior to April 2009, the only mandatory functionality that Geos was unable to provide was to provide an email notification



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to its Voicestick™ customers that account information or passwords had been changed. However, by not accepting passwords or changes of email address except when presented with a password or when the customer could be authenticated by calling the Geos-provided telephone number of record, the potential for unauthorized access by pretexters changing email addresses was virtually eliminated. In addition, while Geos always has had strict policies regarding confidentiality of its information, it reiterated those policies to its employees specifically with respect to the handling of CPNI and the duty to report any breaches of CPNI information immediately.

Respectfully submitted,

Chris R. Miltenberger  
President and Chief Operating Officer  
Geos Communications, Inc.

cc:

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#### Verifications

I, Chris Miltenberger, an officer of Geos Communications, Inc., hereby declare under penalty of perjury that the facts stated in this letter are true and correct, to the best of my knowledge. In making this declaration, I have relied on information received from other employees of Geos Communications, Inc. which information I believe to be true and correct.

Chris Miltenberger

Date: Feb 22, 2010